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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688-RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF
GOOGLE LLC'S MOTION TO QUASH
SUBPOENA OF KENT WALKER**

*[Filed concurrently with the Notice and
Motion and [Proposed] Order]*

Time: 9:30 a.m.
Pretrial Conf: July 30, 2025
Dept: 3, 17th Floor
Judge: Hon. Richard Seeborg

Action Filed: July 14, 2020
Trial Date: August 18, 2025

1 I, EDUARDO E. SANTACANA, declare that:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 with the firm of Cooley LLP, located at 3 Embarcadero Center, 20th Floor, San Francisco, California
4 94111, counsel for Defendant Google LLC (“Google”) in the above-captioned action. Unless
5 otherwise stated, the facts I set forth in this declaration are based on my personal knowledge or
6 knowledge I obtained through my review of corporate records or other investigation. If called to
7 testify as a witness, I could and would testify competently to such facts under oath.

8 2. I submit this declaration in support of Google's Motion to Quash the Subpoena
9 Issued to Kent Walker filed herewith.

10 3. Plaintiffs did not disclose Mr. Walker on their witness list exchanged on June 6,
11 2025.

12 4. Attached hereto as **Exhibit A** is the subpoena Plaintiffs issued to Kent Walker on
13 July 8, 2025.

14 5. I declare under penalty of perjury under the laws of the United States that the
15 foregoing is true and correct.

16 I declare under penalty of perjury under the laws of the State of California and the United
17 States of America that the forgoing is true and correct.

18 Executed on July 22, 2025 at San Francisco, California.

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21 /s/ Eduardo E. Santacana
22 Eduardo E. Santacana
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